

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO,
Plaintiff,
v.
AMBAC ASSURANCE CORPORATION, *et al.*,
Defendants.

Adv. Proc. No. 20-00003-
LTS

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO,
Plaintiff,
v.
AMBAC ASSURANCE CORPORATION, *et al.*,
Defendants.

Adv. Proc. No. 20-00004-
LTS

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO,
Plaintiff,
v.
AMBAC ASSURANCE CORPORATION, *et al.*,
Defendants.

Adv. Proc. No. 20-00005-
LTS

**JOINT INFORMATIVE MOTION REGARDING ARGUMENT AT
MARCH 17, 2021 HEARING**

Ambac Assurance Corporation (“Ambac”), Financial Guaranty Insurance Company (“FGIC”), Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (collectively, “Assured”), National Public Finance Guarantee Corporation (“National,” and collectively with Ambac, FGIC, and Assured, the “Monolines”), The Bank of New York Mellon (“BNY”), U.S. Bank Trust National Association (“U.S. Bank”, and collectively with the Monolines and BNY, the “Defendants”), and the Financial Oversight and Management Board for Puerto Rico (the “Board”), as Title III representative of the Commonwealth of Puerto Rico (the “Commonwealth” or “Debtor”) pursuant to section 315(b) of the Puerto Rico Oversight, Management, and Economic

Stability Act (“PROMESA”), the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF” and together with the Board and the Defendants, the “Parties”) respectively submit this joint informative motion pursuant to the Court’s *Order Setting Procedures for March 17, 2021 Hearing* [ECF No. 16043²], and respectfully states as follows:

1. The Parties will appear via Zoom video conference at the March 17, 2021 Hearing (the “Hearing”) on *Defendants’ Motion to Compel Document Discovery from the Government in the Revenue Bond Adversary Proceedings* [ECF No. 15914] (“the “Motion”), as well as any and all objections, responses, statements, joinders, and replies to the Motion.

2. The following speakers will appear and present oral argument on behalf of the Parties in the order below:

- a. Ambac: Atara Miller (amiller@milbank.com) of Milbank LLP
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- c. National: Robert Berezin (robert.berezin@weil.com) of Weil, Gotshal & Manges LLP
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- e. AAFAF: Elizabeth McKeen (emckeен@omm.com) and Ashley Pavel (apavel@omm.com) of O’Melveny & Meyers LLP
- f. The Board: Michael Firestein (mfirestein@proskauer.com), Lary Rappaport (lrappaport@proskauer.com), and Colin Kass (ckass@proskauer.com) of Proskauer Rose LLP

WHEREFORE, the Parties respectfully request that the Court take notice of the foregoing.

² “ECF No.” refers to documents filed in Case No. 17-BK-3283-LTS, unless otherwise noted.

Dated: March 16, 2021
San Juan, Puerto Rico

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CERTIFICATE OF SERVICE

I hereby certify that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify a copy to counsel of record.

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